

# **EXHIBIT I**

1 other individual Plaintiffs in this lawsuit?

2 MR. EPSTEIN: Objection. Again, if  
3 there's any attorney/client privilege  
4 information don't divulge it.

5 Q. I don't want to know anything you  
6 discussed. I want to know what you know about them?

7 A. Not much.

8 Q. What do you know about the other  
9 individual Plaintiffs?

10 A. I know that there are other Plaintiffs in  
11 this state and in other states.

12 Q. Okay. Would it surprise you to learn that  
13 all the other individual Plaintiffs are White?

14 A. No.

15 Q. Okay. Do you find it ironic that all the  
16 individual Plaintiffs in this case are White?

17 A. No.

18 (Witness cellular phone rings.)

19 Q. Do you find it ironic that there's not one  
20 single individual Black Plaintiff in this case?

21 A. Isn't the National Coalition on Black  
22 Civic Participation a Plaintiff?

23 Q. That's an organization, I'm talking about  
24 individuals. Do you find it ironic that there are  
25 no Black individuals who are Plaintiffs?

1 A. No.

2 Q. Why not?

3 MR. EPSTEIN: Objection.

4 A. Black people don't normally do these type  
5 of things. They can't take off work, they don't  
6 have the personal capacity or they distrust the  
7 legal system.

8 Q. Are you aware that on October 28, 2020 the  
9 Court in this case order my clients to issue a  
10 corrective robocall?

11 A. Yes.

12 Q. And are you aware that that corrective  
13 robocall was distributed on October 30, 2020?

14 A. No, I knew that it happened, I didn't  
15 when.

16 Q. Okay. Have you ever heard that corrective  
17 robocall?

18 A. No.

19 Q. What, if anything, do you know about the  
20 corrective call?

21 A. That it happened. And that they took  
22 responsibility for something.

23 Q. When you say, they, who are you referring  
24 to exactly?

25 A. To the Defendants.

1 earlier with regard to the Michigan coalition's  
2 funding but I just want to ask a couple of questions  
3 about funding. How, in 2020, how much did the  
4 Michigan coalition allocate toward promoting voting?

5 MR. EPSTEIN: Objection.

6 A. I'm sorry, can you stay again?

7 Q. Sure. In 2020, approximately, how much  
8 money did the Michigan coalition allocate toward  
9 promoting voting?

10 MR. EPSTEIN: Objection.

11                   A.     At least forty percent of our budget.

12 Q. Okay. How much of that percentage was a  
13 result of the August 2020 robocall?

14 A. We started doing GOTV messaging three  
15 weeks early and so I would say one to two percent.

16 Q. So, notwithstanding the one to two  
17 percent, is it fair to say that approximately 38% of  
18 the Michigan coalition's budget was spent on voting  
19 in 2020?

20 A. Yes.

21 Q. Is it fair to say that approximately 38%  
22 that was spent on promoting voting in 2020 would  
23 have been spent irrespective of the August 2020  
24 robocall?

25 A. Yes.

1 Q. Is there a way you could measure that?

2 MR. EPSTEIN: Objection.

3 A. I'm sure that it could be measured but I  
4 wouldn't know how. I'm sure polling and, you know,  
5 lots of money for research.

6 Q. In your capacity as, in your capacity with  
7 the Michigan coalition, did you speak to anybody who  
8 stated they were personally deterred from voting as  
9 a result of the robocall?

10 A. No.

11 Q. Did you hear of anybody that was deterred  
12 from voting as a result of the August 2020 robocall?

13 A. Not specifically, no.

14 MR. KLEINMAN: So, if you can, turn to  
15 page 17 of the amended complaint. Let's look  
16 at paragraph 72.

17 (Witness peruses document.)

18 MR. KLEINMAN: Take a few minutes to  
19 review that and let me know when you've had a  
20 opportunity review.

21 THE WITNESS: Yes.

22 Q. Okay. What is the danger that the BWR was  
23 concerned about?

24 A. I believe it was Covid.

25 Q. Does the Michigan coalition have any

1 evidence that this concern actually came to  
2 fruition?

3 A. No.

4 Q. Does the Michigan coalition believe that  
5 voting in-person was more dangerous than going to  
6 the supermarket?

7 MR. EPSTEIN: Objection.

8 A. Can you repeat?

9 Q. Yes, does the Michigan coalition believe  
10 that voting in-person is more dangerous than going  
11 to the supermarket?

12 MR. EPSTEIN: Objection.

13 A. No, we felt they were equally dangerous at  
14 that time.

15 Q. In August, from August through November of  
16 2020 did the Michigan coalition believe that voting  
17 was less important than going to the supermarket?

18 MR. EPSTEIN: Objection.

19 A. I don't believe so.

20 Q. Between August 2020 and November of 2020  
21 did the Michigan coalition believe that it was more,  
22 that voting in-person was more dangerous than going  
23 to the bank?

24 MR. EPSTEIN: Objection.

25 A. We felt it was equally as dangerous.